

1 Office of the City Attorney  
2 Cris Meyer, City Attorney, No. 012262  
3 200 West Washington, Suite 1300  
4 Phoenix, Arizona 85003-1611  
5 Telephone (602) 262-6761  
6 law.civil.minute.entries@phoenix.gov

7 Garrett Griggs, No. 030525  
8 Assistant City Attorney  
9 Attorney for Defendants David Snow, Joshua Mesquita, and City of Phoenix Police  
10 Department

11 IN THE UNITED STATES DISTRICT COURT

12 FOR THE DISTRICT OF ARIZONA

13 Joshua Baker, a single man; and Todd  
14 Brown, a single man,

15 Plaintiff(s), Case No. \_\_\_\_\_

16 vs. (Maricopa County Case No. CV2019-000180)

17 Officer Snow (06255), Officer Mesquita  
18 (0852), City of Phoenix Police  
19 Department, Employees I-X and Black  
20 and White Corporations I-X,

21 Defendants.

22 **NOTICE OF REMOVAL**

23 Defendants David Snow, Joshua Mesquita, and City of Phoenix Police Department  
24 ("City Defendants"), through undersigned counsel, and pursuant to 28 U.S.C. § 1441(a)  
and LRCiv 3.6, hereby notices the removal of the above referenced action commenced  
and now pending in the Superior Court of the State of Arizona, in and for the County of  
Maricopa entitled *Joshua Baker, a single man; and Todd Brown, a single man,*

1 Plaintiff(s), vs. Officer Snow (06255), Officer Mesquita (0852), City of Phoenix Police  
2 Department, Employees I-X and Black and White Corporations I-X, Defendants, Civil  
3 Action No. CV2019-000180, and in support of removal asserts the following:

4 1. Petitioners are Defendants in the Superior Court of the State of Arizona in  
5 and for the County of Maricopa under the caption *Joshua Baker, a single man; and Todd*  
6 *Brown, a single man, Plaintiff(s), vs. Officer Snow (06255), Officer Mesquita (0852),*  
7 *City of Phoenix Police Department, Employees I-X and Black and White Corporations I-*  
8 *X, Defendants*, Maricopa County Superior Court Case No. CV2019-000180. Copies of  
9 the Complaint and all other documents previously filed in this matter are in **Exhibit A** of  
10 the Index filed simultaneously with this pleading.

11 2. The first date upon which Defendant Dejan Nadzakovic received a copy of  
12 the Complaint was March 20, 2019.

13 3. Plaintiffs have asserted a claim of violation of their Civil Rights under 42  
14 U.S.C. §1983 and a violation of their Fourth Amendment rights.

15 4. This Notice of Removal is being filed within 30 days after Service of the  
16 Summons and Complaint and is therefore timely under 28 U.S.C. § 1446(b).

17 5. A Notice of Filing of Notice of Removal has been filed in the Arizona  
18 Superior Court, County of Maricopa, on behalf of Defendant. A true and correct copy of  
19 the Notice is in **Exhibit B** of the Index filed simultaneously with this pleading.

20 WHEREFORE, Defendant respectfully requests that the above action now  
21 pending in the Arizona Superior Court, Maricopa County, be removed to this Court.

22  
23 ...  
24

1 DATED this 9<sup>th</sup> day of April, 2019.

2  
3  
4 Office of the Phoenix City Attorney  
5 Cris Meyer, City Attorney

6  
7 By: /s/ Garrett Griggs

8 Garrett Griggs  
9 Assistant City Attorney  
10 200 West Washington, Suite 1300  
11 Phoenix, Arizona 85003-1611  
12 Attorney for Defendants David Snow, Joshua  
13 Mesquita, and City of Phoenix Police  
14 Department

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24 **CERTIFICATE OF SERVICE**

10 I hereby certify that on April 9, 2019, I served the attached document by email on  
11 the following:

12  
13  
14 Percival Bradley, Esq.  
15 Bradley & Associates  
16 Attorneys at Law, P.L.C.  
17 P.O. Box #2213  
18 Litchfield Park, AZ 85340  
19 Attorney for Plaintiffs

20  
21  
22  
23  
24 /s/ Carol Aparicio  
25 2103174

# EXHIBIT A

1 **BRADLEY & ASSOCIATES**  
 2 **Attorneys at Law, P.L.C.**  
 3 **P.O. Box, #2213**  
 4 **Litchfield Park, AZ 85340**  
 5 **(602) 266-2929 Fax (602) 467-3105**

4 **Percival R. Bradley**  
 5 **State Bar No. 017149**  
 6 **Attorney for: Plaintiffs**

Clerk of the Superior Court  
 By Ashley Hatch, Deputy  
 Date 01/15/2019 Time 11:14:41  
 Description Amount  
 CASE# CV2019-000180  
 CIVIL NEW COMPLAINT 333.00  
 TOTAL AMOUNT 333.00  
 Receipt# 26991580

6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
 7 **IN AND FOR THE COUNTY OF MARICOPA**

9 **JOSHUA BAKER, a single man; and**  
 10 **TODD BROWN, a single man;**

11 **Plaintiffs,**

12 **vs.**

13 **OFFICER SNOW(06255), OFFICER**  
 14 **MESQUITA(0852), CITY OF PHOENIX**  
 15 **POLICE DEPARTMENT, EMPLOYEES I-**  
 16 **X and BLACK AND WHITE**  
 17 **CORPORATIONS I-X,**

18 **Defendants.**

Case No.

CV 2019-000180

COMPLAINT

(Tort/Non-Auto)

19 Plaintiffs, as and for their cause of action against the Defendants, complain and  
 20 allege as follows:

21 I.

22 Plaintiffs, are African American residents of Maricopa County, Arizona.

23 II.

24 All acts complained of herein transpired in Maricopa County, Arizona.

25 III.

26 Defendants at all times relevant to the incidents alleged were acting under color  
 27 of authority.

28

IV.

Defendants at all times relevant to the incidents alleged were employed as officers with the City of Phoenix Police Department.

v

Defendants at all times of relevant to the incidents alleged were on duty as detectives of the City of Phoenix Police Department.

VI

Employees I-X, are designated by fictitious names and at all times relevant to the incidents alleged herein were employed by City of Phoenix Police Department . These Defendants are designated by fictitious names pursuant to Rule 10 (f) of the Arizona Rules of Civil Procedures as their true names are unknown to Plaintiffs. By designating them under fictitious names, Plaintiffs preserve the right to formally name them as the identities become known.

vii

Employees I-X at all times relevant to the incidents alleged herein were acting within the scope of their employment with City of Phoenix Police Department.

VIII

On February 15, 2018 at approximately 4:45 p.m., Joshua Baker, Todd Brown and their friend were all riding in a 1999 gold Chrysler Sebring. Joshua was driving as they were on the way to drop Todd off at work. As Joshua pulled into the parking lot of the Salvation Army, located at 1375 E. Broadway road, a police car pulled in behind him with no visible lights or sirens. As Mr. Baker slowed to a stop officers jumped out of the vehicle and ran up to the car. The officers immediately pulled all three men from the car, even before it was fully in park. By this time a second police vehicle pulled up with more officers. All three men were slammed against the car, handcuffed and placed on the curb.

1 The police responded this way despite the fact that the men did not try to  
2 evade, were not traveling at excessive speeds and had no idea they were being  
3 followed by the police. The men were stopped for an alleged traffic violation. The  
4 men were pulled from the vehicle without giving them the opportunity to provide  
5 license, registration and insurance.

6 The officers were verbally abusive, responding to questions of 'what did we do',  
7 with "you know what the f\*\*k you did". They accused the men of being in a gang.  
8 None of the men offered any kind of resistance.

IX

10 While detaining Plaintiffs Defendants conducted a search of their persons  
11 without probable cause or reasonable suspicion.

x

While detaining Plaintiffs Defendants conducted an unauthorized search of the vehicle without probable cause or reasonable suspicion.

## **LIABILITY**

xi

20 Defendants' actions violated 42 U.S.C. 1983 by depriving Plaintiffs of their right  
21 to be free from unlawful search and seizure as secured by the constitution.

xii

At the time of the incident Defendants were employed with the Phoenix police department and acting in their official capacity.

XIII.

Defendant Phoenix police were negligent in their hiring, training and supervision of Defendants.

XIV.

Defendant Phoenix police were negligent in the enforcement of the department's policy and procedures relating to the prevention of officers violating the civil rights of citizens.

xv.

Defendants without reasonable suspicion of criminal activity detained plaintiffs longer than reasonably necessary to conduct a traffic stop.

xvi

Defendants without probable cause detained Plaintiffs under the ruse of a traffic stop for the sole purpose of conducting a search.

xvii.

Defendants conducted a vehicle search without probable cause in the absence of consent written or otherwise.

xviii.

Defendants' actions amounted to selective enforcement of the traffic laws.

XIX

The stopping of three African American citizens without probable cause and their subsequent detention and illegal search amounted to racial profiling.

xx

**City of Phoenix was negligent in the hiring, training, and placement of defendants.**

xxi

Defendants were negligent in the enforcement of the department's policy and procedure to prevent illegal searches and racial profiling.

xxii

City of Phoenix Police Department has a prior history of officers engaging in acts of racial profiling.

1  
2 **DAMAGES**  
3

4 **XXIII.**  
5

6 As a direct and proximate result of defendants' negligence, and willful  
7 misconduct, plaintiffs suffered emotional distress.  
8

9 **XXIV.**  
10

11 As a direct and proximate result of defendants negligence, and willful  
12 misconduct, plaintiffs civil and constitutional rights were violated.  
13

14 **XXV.**  
15

16 As a direct and proximate result of defendants' negligence, plaintiffs freedom,  
17 privacy and movement were unlawfully restricted.  
18

19 WHEREFORE, Plaintiffs pray for Judgment against the Defendants as follows:  
20

21

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29

1. For such sums and for general damages as my be just and fair;
2. For punitive damages;
3. For costs incurred herein and accruing, together with  
interest at the highest lawful rate;
4. For such other and further relief as the Court may deem just and proper.

23 Dated this 15th day of January, 2019.  
24

## BRADLEY & ASSOCIATES P.L.C.

Percival R. Bradley, Esq.  
Attorney for Plaintiffs

**ORIGINAL** filed this  
\_\_\_\_ day of January, 2019 at:

**Clerk of Superior Court  
201 W. Jefferson  
Phoenix, Arizona 85003**

**BRADLEY & ASSOCIATES**  
Attorneys at Law, P.L.C.  
210 East Catalina Drive  
Phoenix, AZ 85012

CHRIS DEROSA, CLERK  
BY *A. Hatch* DEP

A. HATCH, FILED

19 JAN 15 AM 11:14

1 **BRADLEY & ASSOCIATES**  
2 **Attorneys at Law, P.L.C.**  
3 **P.O. Box #2213**  
4 **Litchfield Park, AZ 85340**  
5 **(602) 266-2929 Fax 258-5070**  
6 **Percival R. Bradley**  
7 **State Bar No. 017149**  
8 **Attorney for: Plaintiff**

6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
7 **IN AND FOR THE COUNTY OF MARICOPA**

9 **JOSHUA BAKER, a single man; and**  
10 **TODD BROWN, a single man;**

11 **Plaintiffs,**

12 **vs.**

13 **OFFICER SNOW(06255), OFFICER**  
14 **MESQUITA(0852), CITY OF PHOENIX**  
15 **POLICE DEPARTMENT, EMPLOYEES I-**  
16 **X and BLACK AND WHITE**  
17 **CORPORATIONS I-X,**

18 **Defendants.**

Case No. **CV 2019-000180**

**CERTIFICATE OF ARBITRATION**

**(Tort Non-Auto)**

19 **COMES NOW, Plaintiffs, by and through counsel undersigned, and pursuant to**  
20 **the Mandatory Alternative Discovery Track, hereby submits the following:**

21 **The undersigned certifies that this action is not subject to compulsory**  
22 **arbitration pursuant to the Uniform Rules of Procedure of Arbitration and Local Rule.**  
23 **No party seeks affirmative relief other than a monetary judgment, and the award**  
24 **sought is in excess of the jurisdictional limit for arbitration set by this Court, including**  
25 **punitive damages but excluding interest, attorney's fees or costs.**

1 DATED this 15th day of January, 2019.

## BRADLEY & ASSOCIATES

Percival R. Bradley, Esq.  
Attorney for Plaintiff

**ORIGINAL** filed this  
\_\_\_\_ day of January, 2019 at:

**Clerk of the Court  
MARICOPA COUNTY SUPERIOR COURT  
201 West Jefferson Street  
Phoenix, Arizona 85201**



**110 TORT NON-MOTOR VEHICLE:**

- 111 Negligence\*
- 112 Product Liability – Asbestos\*
- 112 Product Liability – Tobacco\*
- 112 Product Liability – Toxic/Other\*
- 113 Intentional Tort\*
- 114 Property Damage\*
- 115 Legal Malpractice\*
- 115 Malpractice – Other professional\*
- 117 Premises Liability\*
- 118 Slander/Libel/Defamation\*
- 116 Other (Specify) \_\_\_\_\_\*

**120 MEDICAL MALPRACTICE:**

- 121 Physician M.D.\*       123 Hospital\*
- 122 Physician D.O\*       124 Other\*

**130 & 197 CONTRACTS:**

- 131 Account (Open or Stated)\*
- 132 Promissory Note\*
- 133 Foreclosure\*
- 138 Buyer-Plaintiff\*
- 139 Fraud\*
- 134 Other Contract (i.e. Breach of Contract)\*
- 135 Excess Proceeds-Sale\*
- Construction Defects (Residential/Commercial)\*
  - 136 Six to Nineteen Structures\*
  - 137 Twenty or More Structures\*
- 197 Credit Card Debt (Maricopa County Only)\*

**150-199 OTHER CIVIL CASE TYPES:**

- 156 Eminent Domain/Condemnation\*
- 151 Eviction Actions (Forcible and Special Detainers)\*
- 152 Change of Name
- 153 Transcript of Judgment
- 154 Foreign Judgment

- 158 Quiet Title\*
- 160 Forfeiture\*
- 175 Election Challenge
- 179 NCC-Employer Sanction Action (A.R.S. §23-212)
- 180 Injunction against Workplace Harassment
- 181 Injunction against Harassment
- 182 Civil Penalty
- 186 Water Rights (Not General Stream Adjudication)\*
- 187 Real Property \*
- Special Action against Lower Courts
  - (See Lower Court Appeal cover sheet in Maricopa)
- 194 Immigration Enforcement Challenge
  - (A.R.S. §§1-501, 1-502, 11-1051)

**150-199 UNCLASSIFIED CIVIL:**

- Administrative Review
  - (See Lower Court Appeal cover sheet in Maricopa)
- 150 Tax Appeal
  - (All other tax matters must be filed in the AZ Tax Court)
- 155 Declaratory Judgment
- 157 Habeas Corpus
- 184 Landlord Tenant Dispute – Other\*
- 190 Declaration of Factual Innocence (A.R.S. §12-771)
- 191 Declaration of Factual Improper Party Status
- 193 Vulnerable Adult (A.R.S. §46-451)\*
- 165 Tribal Judgment
- 167 Structured Settlement (A.R.S. §12-2901)
- 169 Attorney Conservatorships (State Bar)
- 170 Unauthorized Practice of Law (State Bar)
- 171 Out-of-State Deposition for Foreign Jurisdiction
- 172 Secure Attendance of Prisoner
- 173 Assurance of Discontinuance
- 174 In-State Deposition for Foreign Jurisdiction
- 176 Eminent Domain- Light Rail Only\*
- 177 Interpleader- Automobile Only\*
- 178 Delayed Birth Certificate (A.R.S. §36-333.03)
- 183 Employment Dispute- Discrimination\*

185 Employment Dispute-Other\*  
 196 Verified Rule 45.2 Petition  
 195(a) Amendment of Marriage License  
 195(b) Amendment of Birth Certificate

163 Other\*

\_\_\_\_\_  
(Specify)

**EMERGENCY ORDER SOUGHT**

Temporary Restraining Order       Provisional Remedy       OSC       Election Challenge  
 Employer Sanction       Other (Specify) \_\_\_\_\_

**COMMERCIAL COURT (Maricopa County Only)**

This case is eligible for the Commercial Court under Rule 8.1, and Plaintiff requests assignment of this case to the Commercial Court. More information on the Commercial Court, including the most recent forms, are available on the Court's website at:

<https://www.superiorcourt.maricopa.gov/commercial-court/>.

**Additional Plaintiff(s):**

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**Additional Defendant(s):**

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1 Arizona Process Service L.L.C.  
 2 70 S. Val Vista Dr. Suite A3336  
 3 Gilbert, AZ 85296  
 4 480-430-5556

CLERK OF THE  
 SUPERIOR COURT  
 RECEIVED SE  
 DOCUMENT DEPOSITORY

2019 MAR 26 PM 1:12  
 FILED  
 BY L. GUTIERREZ, DEP

6 SUPERIOR COURT OF ARIZONA  
 7 MARICOPA COUNTY

8 In Re the Matter of:

9 JOSHUA BAKER, a single man; and ) Case No. CV2019-000180  
 10 TODD BROWN, a single man; )  
 11 Plaintiffs, ) CERTIFICATE OF SERVICE  
 12 Vs. )  
 13 OFFICER SNOW(06255), OFFICER )  
 14 MESQUITA(0852), CITY OF PHOENIX POLICE )  
 15 DEPARTMENT, EMPLOYEES I-X and BLACK )  
 16 AND WHITE CORPORATIONS I-X )  
 17 Defendants. )

18 I, Oscar Miller do depose that on said date March 18, 2019. I received documents listed below from  
 19 Bradley & Associates Law Office requesting regular service of process.

20 I, Oscar Miller do depose that on said date, March 20, 2019 at 10:36 A.M., I hand delivered and served a  
 21 copy of the **SUMMONS (Tort Non-Auto); COMPLAINT (Tort/Non-Auto); CERTIFICATE OF ARBITRATION**  
 22 **(Tort Non-Auto)** to Phoenix Police Department by serving City of Phoenix City Clerk's Office to Connie Haesloop  
 23 who is the Special Deputy City Clerk for the City Clerk Department; Said documents were hand delivered and  
 24 served at the address of the City Clerk Department 200 W. Washington Street, 15<sup>th</sup> Floor, Phoenix, AZ 85003.

25 Connie Haesloop's physical description is as follows: Hispanic female, approximately 50-60 years of age,  
 26 5'3" tall and 140 pounds with brown hair.

I declare under the penalty of perjury that the above information is correct and true to the best of my  
 knowledge. A fee of \$95.00 was charged for this Service of Process.



Certified Officer Superior Court  
 Registered in Maricopa County, AZ  
 Oscar Miller # 7421

Person Filing: Erick DodakianAddress (if not protected): 4406 E Main St STE 102-100City, State, Zip Code: Mesa AZ 85205

Telephone: \_\_\_\_\_

Email Address: e.dodakian

Lawyer's Bar Number: \_\_\_\_\_

MICHAEL K. JEANES	
Clerk of the Superior Court	
By Alejandro Fimbres, Deputy	
Date 01/03/2018 Time 14:04:54	
Description	Amount
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CASE# CV2018-093038	0.00
NEW COMPLAINT Clerk's Use	0.00
TOTAL AMOUNT	0.00
Receipt# 26338857	

Representing  Self, without a Lawyer or  Attorney for  Petitioner OR  Respondent

## SUPERIOR COURT OF ARIZONA IN MARICOPA COUNTY

CV 2018-093038

Erick Dodakian

Name of Plaintiff

Case Number: \_\_\_\_\_

Title: **CIVIL COMPLAINT**Baron Gelwicks

Name of Defendant

\_\_\_\_\_

Plaintiff hereby submits this complaint against Defendant(s) and alleges the following:

### JURISDICTION and VENUE

1. Maricopa County Superior Court has the legal authority to hear and decide this case because: (Check all boxes that are true.)

- The value of this case exceeds \$10,000 dollars.
- Replevin or other nonmonetary remedy will take place in Maricopa County.
- The Plaintiff resides in Maricopa County.
- The Defendant resides in Maricopa County.
- The Defendant does business in Maricopa County.
- The events, actions, or debts subject of this Complaint occurred in Maricopa County.
- Other reason: \_\_\_\_\_

**PARTIES**

2. The Plaintiff in this case is Erick Dodakian

3. The Defendant in this case is Baron Gelwicks

**STATEMENT OF FACTS AND BREACH**

4. Erick Dodakian sustained a further spinal injury due to the assault
5. that took place in a parking lot at westgate. medical file and 911 call
6. will be submitted as evidence.

7. \_\_\_\_\_

8. \_\_\_\_\_

9. \_\_\_\_\_

(If you need more space, add an attachment labeled "Statement of Facts and Breach," and continue consecutive numbering.)

**APPLICABLE LAW SUPPORTING CLAIMS**

( ) 13-1204 Aggravated assault:

A. A person commits aggravated assault if the

( ) person commits assault as prescribed by  
Section 13-1203 under any of the following circumstances

- ( 1 ) If the person causes serious physical injury to another
- ( 2 ) If the person uses a deadly weapon or dangerous instrument
- ( 3 ) If the person commits the assault by means of force that causes, temporary, but substantial disfigurement, temporary but substantial loss or impairment of any body organ or part or a fracture of any body part:

(If you need more space, add an attachment labeled "Applicable Laws Supporting Claims," and continue consecutive numbering.)

#### INJURIES

- ( 1 ) Eric Dodatian sustained further a spinal injury due to the assault
- ( 2 ) that took place in a parking lot at Westgate. Medical file, and 911
- ( 3 ) call will be submitted as evidence.

( 4 ) \_\_\_\_\_

( 5 ) \_\_\_\_\_

( 6 ) \_\_\_\_\_

(If you need more space, add an attachment labeled "Injuries," and continue consecutive numbering.)

#### DEMAND FOR RELIEF

**WHEREFORE**, Plaintiff demands judgment against defendant(s), and each of them (if applicable) for the following dollars, interest, costs and expenses incurred herein, or non-monetary remedy, including reasonable attorneys' fees, and for such other and further relief as the Court may deem just and proper.

( ) \_\_\_\_\_  
\_\_\_\_\_  
( ) \_\_\_\_\_  
\_\_\_\_\_  
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( ) \_\_\_\_\_  
\_\_\_\_\_

(If you need more space, add an attachment labeled "Demand for Relief," and continue consecutive numbering.)

**DEMAND FOR JURY TRIAL (Optional)**

I request a jury trial, and wrote this in the "Title" below the words "Civil Complaint."

Dated this Jan 3 2018  
(Date of signature)

A. Dodalian  
(Signature of Plaintiff or Plaintiff's Attorney)

## EXHIBIT B

1 Office of the City Attorney  
2 Cris Meyer, City Attorney, No. 012262  
200 West Washington, Suite 1300  
3 Phoenix, Arizona 85003-1611  
3 Telephone (602) 262-6761  
4 law.civil.minute.entries@phoenix.gov  
4  
5 Garrett Griggs, No. 030525  
5 Assistant City Attorney  
6 Attorney for Defendants David Snow, Joshua Mesquita, and City of Phoenix Police  
6 Department

7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

8 IN AND FOR THE COUNTY OF MARICOPA

9  
10 JOSHUA BAKER, a single man; and  
10 TODD BROWN, a single man,

11 Plaintiff(s),

Case No. CV2019-000180

12 vs.

13 OFFICER SNOW (06255), OFFICER  
14 MESQUITA (0852), CITY OF  
15 PHOENIX POLICE DEPARTMENT,  
16 EMPLOYEES I-X and BLACK AND  
WHITE CORPORATIONS I-X,

**DEFENDANTS' NOTICE OF FILING  
NOTICE OF REMOVAL**

(Assigned to the Honorable Teresa Sanders)

17 Defendants.

18  
19 Defendants David Snow, Joshua Mesquita, and City of Phoenix Police  
20 Department, ("City Defendants") by and through undersigned counsel, and pursuant to  
21 28 U.S.C. §1441, et seq., hereby notify this Court that they have filed a Notice of  
22 Removal of this action to the United States District Court for the District of Arizona. A  
23 copy of the Notice of Removal filed April 5, 2019, is attached as **Exhibit A**.  
24

1 DATED this 9<sup>th</sup> day of April, 2019.  
2  
3

4  
5  
6 Office of the Phoenix City Attorney  
7 Cris Meyer, City Attorney  
8  
9

10 By: /s/ Garrett Griggs  
11 Garrett Griggs  
12 Assistant City Attorney  
13 200 West Washington, Suite 1300  
14 Phoenix, Arizona 85003-1611  
15 Attorney for Defendants David Snow, Joshua  
16 Mesquita, and City of Phoenix Police  
17 Department  
18  
19

20 Original of the foregoing electronically  
21 filed and COPY electronically served on  
22 April 9, 2019, to:  
23  
24

25 Percival Bradley, Esq.  
26 Bradley & Associates  
27 Attorneys at Law, P.L.C.  
28 P.O. Box #2213  
29 Litchfield Park, AZ 85340  
30 Attorney for Plaintiffs  
31  
32

33 By: /s/ Carol Aparicio  
34 2103175  
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